

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

FILED
CLERK'S OFFICE
SEP 13 2004
13:15
DISTRICT OF MASS.

SECRETARY OF LABOR,
United States Department of Labor,

Plaintiff,

v.

CAVALIER SECURITY & PATROL, INC.,
FRANCOIS YOUHANNA, TONY
YOUHANNA and HANNA YOUHANNA,

Defendants.

CIVIL ACTION

FILE NO. 04-10029 RCL

MOTION TO RESCHEDULE PRE-TRIAL CONFERENCE

Comes now Plaintiff, Secretary of Labor, and serves and files her Motion to Reschedule Pre-Trial Conference in the above-captioned matter, for the following reasons:

1. Pre-Trial Conference is currently scheduled for September 16, 2004.
2. September 16, 2004 is a Jewish holiday, the second day of Rosh Hashanah, and counsel for Plaintiff expects to take leave to worship that day.
3. Counsel for Plaintiff has discussed this motion with counsel for Defendants, who is not opposed to this motion.

Accordingly, Plaintiff herewith requests the Court to reschedule the Pre-Trial Conference to another day, at the convenience of the Court.

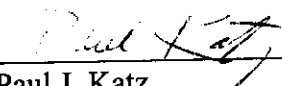
Respectfully submitted,

Post Office Address:

U.S. Department of Labor
Office of the Solicitor
JFK Federal Building
Room E-375
Boston, MA 02203
TEL:(617)565-2500
FAX:(617)565-2142

Howard M. Radzely
Solicitor of Labor

Frank V. McDermott, Jr.
Regional Solicitor


Paul J. Katz
Senior Trial Attorney

U.S. Department of Labor
Attorneys for Complainant

CERTIFICATE OF SERVICE

I hereby do certify that I served the foregoing MOTION TO RESCHEDULE PRE-TRIAL CONFERENCE on the 13th day of September, 2004, by placing one (1) copy of same in a postage-paid envelope addressed to:

Albert C. Flanders, Esquire
Pollock and Flanders
50 Congress Street, Suite 430
Boston, MA 02109

the last known address and depositing same in the United States Mail at Boston, Massachusetts.

